

# Exhibit B

each email address was used” as vague, ambiguous, and unduly burdensome. Dao Health will answer as to the date ranges that an email address accessible to Dao Health and was used to affirmatively send or receive emails on behalf of Dao Health. Dao Health objects to this interrogatory as compound and unduly burdensome. Dao Health objects to this interrogatory because it constitutes multiple interrogatories that should be counted as separate interrogatories and may exceed the number of allowed interrogatories. Dao Health objects to this interrogatory as seeking information that is not necessary for Elvie to serve e-mail search terms pursuant to the stipulated E-Discovery Order (Dkt. 31).

Without waiving the foregoing general and specific objections, Dao Health responds as follows:

- Ron Briggs: Mr. Briggs began advising Dan Garbez as a consultant without pay in or around February 2006, and has been employed by Dao Health since approximately November 2013. Based on records located after a reasonably diligent search, Dao Health believes Mr. Briggs has used or uses the following email addresses to perform work for Dan Garbez or Dao Health: ron.briggs@neoware.com (approx. Feb. 2006 to Aug. 2006); ronbriggs5@yahoo.com (approx. Dec. 2006 to Nov. 2013); and ron@freemie.com (approx. Nov. 2013 to present). Mr. Briggs infrequently sent or received emails from the ronbriggs5@yahoo.com account related to official Dao Health business between approximately November 2013 and December 2022, but Mr. Briggs expects these emails to be duplicated in the ron@freemie.com inbox or in other Dao Health custodians’ email inboxes.
- Dr. Stella Dao: Dr. Dao has done work related to Dao Health’s business since approximately February 2004. Based on records located after a reasonably diligent search, Dao Health believes Dr. Dao uses the following email addresses to perform work for Dao Health: sdaomd@yahoo.com (approx. Feb. 2004 to present). Dr. Dao has access to stella@daohealth.com and stella@freemie.com email accounts since approximately September 2006 and August 2013 respectively, but does not use those accounts to perform work for Dao Health.
- Dan Garbez: Mr. Garbez has done work related to Dao Health’s business since approximately February 2004. Based on records located after a reasonably diligent search, Dao Health believes Mr. Garbez has used or uses the following email addresses to perform work for Dao Health: dgglobal@aol.com (approx. Feb. 2004 to Sep. 2006); dgarbez@ufleet.com (approx. Feb. 2004 to Sep. 2006); and dan@daohealth.com (approx. Sep. 2006 to present). Mr. Garbez infrequently sent or received emails related to official Dao Health business at dgarbez@ufleet.com between approximately February 2004 to February 2007, and at dan.garbez@gmail.com between approximately October 2011 to present, but Mr. Garbez expects these emails to be duplicated in

the dan@daohealth.com inbox or in other Dao Health custodians' email inboxes. Emails sent to dan@freemie.com or to otherwise invalid email addresses using the @daohealth.com or @freemie.com domains are automatically forwarded to Mr. Garbez's dan@daohealth.com account.

- Brian McCollum: Mr. McCollum advised Dao Health as an independent consultant in or around February 2009, and received pay for his consulting work beginning in or around February 2011. Mr. McCollum was an official Dao Health employee from approximately July 2019 to December 2023, before and after which time he continued to support Dao Health as a consultant. Based on records located after a reasonably diligent search, Dao Health believes Mr. McCollum has used or uses the following email addresses to perform work for Dao Health: bmccollu@yahoo.com (approx. Feb. 2009 to May 2013); brian.mccollum@gmail.com (approx. May 2009 to May 2013); bmccollum@sadramedical.com (approx. Feb. 2011 to Nov. 2011); rctman69@gmail.com (approx. Dec. 2011 to May 2013); cubpack146@gmail.com (approx. Feb. 2013 to May 2013); bmccollum@biocardia.com (approx. Sep. 2012 to May 2013); brian.McCollum@bsci.com (approx. Oct. 2011 to Mar. 2012); brian@freemie.com (approx. May 2013 to Dec. 2023); and brian@gsdmeddevice.com (approx. Dec. 2023-present). Mr. McCollum infrequently sent or received emails related to official Dao Health business between approximately May 2013 to December 2023 at cubpack146@gmail.com, rctman69@gmail.com, bmccollum@biocardia.com, brian@gsdmeddevice.com, bmccollu@yahoo.com, brian.mccollum@gmail.com, and brian@uroviu.com, but Mr. McCollum expects these emails to be duplicated in the brian@freemie.com inbox or in other Dao Health custodians' email inboxes.
- Theresa Mulnix: Ms. Mulnix advised Dan Garbez without pay beginning in or around February 2006, and began using a Dao Health email address in approximately October 2013. Based on records located after a reasonably diligent search, Dao Health believes Ms. Mulnix has used or uses the following email addresses to perform work for Dan Garbez or Dao Health: mtmulnix@comcast.net (approx. Feb. 2006 to Feb. 2014); theresa@cmbdesign.com (approx. May 2006 to Feb. 2014); and admin@freemie.com (approx. Feb. 2014 to present). Ms. Mulnix infrequently sent or received emails related to official Dao Health business from approximately February 2014 to present from mtmulnix@comcast.net and theresa@cmbdesign.com, but Ms. Mulnix expects these emails to be duplicated in the admin@freemie.com inbox or in other Dao Health custodians' email inboxes.
- Dave Paul: Mr. Paul began working as a part-time consultant for Dan Garbez beginning in or around July 2004, began as a full-time unpaid Dao Health consultant in or around May 2013, and became a full-time Dao Health employee from approximately 2015 to January 2023. Based on records located after a reasonably diligent search, Dao Health believes Mr. Paul used the following email addresses to perform work for Dan Garbez or Dao Health: evanally@pacbell.net (approx. July 2004 to May 2006); gmsuds2@yahoo.com (approx. Oct. 2005 to May 2013); and dave@freemie.com (approx. May 2013 to Jan. 2023). Mr. Paul occasionally sent or received emails related to Dao Health business between approximately May 2013 to February 2022 at gmsuds2@yahoo.com, but Dao Health expects these emails to be duplicated in Mr. Paul's dave@freemie.com inbox or in other Dao Health custodians' email inboxes.
- Jennifer Reuther: Ms. Reuther worked for Dao Health from approximately May 2006 to

January 2011 and again from October 2014 to present. Based on records located after a reasonably diligent search, Dao Health believes Ms. Reuther has used or uses the following email addresses to perform work for Dao Health: reutherj@yahoo.com (approx. May 2006 to Aug. 2006); jennifer@daohealth.com (approx. Aug. 2006 to Jan. 2011); jen@freemie.com (approx. Oct. 2014 to present). Ms. Reuther has also sent and received emails related to official Dao Health business from reutherj@yahoo.com between approximately May 2006 to January 2010 and October 2014 to present, but expects these emails to be duplicated in the jennifer@daohealth.com or jen@freemie.com inboxes as well as in other Dao Health custodians' email inboxes.

- Ben Sutton: Mr. Sutton began working as a part-time consultant for Dan Garbez beginning in or around July 2004, began as a full-time unpaid Dao Health consultant in or around May 2013, and became a full-time Dao Health employee from approximately 2015 to January 2023. Based on records located after a reasonably diligent search, Dao Health believes Mr. Sutton used the following email addresses to perform work for Dan Garbez or Dao Health: ben@bsutt.com (approx. July 2004 to May 2013); bsutt21@sbcglobal.net (approx. Apr. 2005 to May 2013); and ben@freemie.com (approx. May 2013 to Jan. 2023). Mr. Sutton infrequently sent or received emails related to official Dao Health business between approximately May 2013 to November 2021 at ben@bsutt.com and bsutt21@sbcglobal.net, but Dao Health expects these emails to be duplicated in Mr. Sutton's ben@freemie.com inbox or in other Dao Health custodians' email inboxes.

By identifying an individual's email address above, Dao Health is not representing that it is in possession, custody, control of the email address or that emails from the address were detained, still exist, or are otherwise discoverable. By answering this interrogatory, Dao Health does not waive its right to object to any discovery request involving or relating to the subject matter of Dao Health's response on any grounds, including relevancy, privilege, undue burden, confidentiality, proportionality, or any other appropriate grounds.

Dao Health's investigation is ongoing, and Dao Health reserves the right to amend or supplement this response to provide additional information in accordance with its obligations under the Federal Rules of Civil Procedure, the Court's Local Rules, and the Court's Docket Control Order (Dkt. 26).

Date: June 6, 2024

By: /s/ Meng Xi  
Meng Xi – Lead Counsel